

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ADELICIA MELENDEZ BURGOS

DEBTOR

CASE NO. 16-03855 BKT

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME TO  
REPLY TO AMENDED OBJECTION PLAN CONFIRMATION &  
REQUEST OF DISMISSAL DOCKET NO. 58**

TO THE HONORABLE COURT:

COMES NOW, **ADELICIA MELENDEZ BURGOS**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. First Bank Puerto Rico ("First Bank") filed a *Amended Objection Plan Confirmation & Request of Dismissal*, Docket no. 58, basically stating that the Debtor's modified Plan (Docket No. 50) provides for the surrender of a leased motor vehicle and that the Debtor has failed to "...surrender the lease not called to coordinate its surrender not provide the information of a third party in possession...", that the lease contract is now nine post-petition payments in arrears, thus, First Bank requests the Court to "...order the debtor to lift the stay in favor of Movant, for Movant to proceed with the repossession of the unit, or to surrender the collateral subject to the lease...". *Amended Objection Plan Confirmation & Request of Dismissal*, at paragraphs 3, 7 and 16, Docket no. 58.

2. The Debtor respectfully requests additional time within to meet with her undersigned attorney and coordinate the surrender of said leased motor vehicle, in order to adequately reply to First Bank's motion (Docket No. 58).

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3. Based on the aforementioned, the Debtor needs an extension of time of fourteen (14) days within to surrender the leased motor vehicle to First Bank and adequately reply to First Banks' objection and request for dismissal (Docket NO. 58), in the present case. This extension of time to expire on September 24, 2018.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq. ; Maria M Benabe-Rivera, Esq., Counsel for First Bank Puerto Rico; and to all CM/ECF participants; I also certify that a copy of this motion was sent via US Mail to the Debtor, Adelicia Melendez Burgos Altos de la Fuente E 2 Calle 2 Caguas PR 00725.

**RESPECTFULLY SUBMITTED**, in San Juan, Puerto Rico, this 10<sup>th</sup> day of September, 2018.

/s/Roberto Figueroa Carrasquillo  
USDC #203614  
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